

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Murtuza Khan,	)	
	)	
Plaintiff,	)	1:20-cv-05833
	)	
vs.	)	Judge Manish S. Shah
	)	
Ocwen Loan Servicing, LLC,	)	Mag. Jeffrey I. Cummings
	)	
Defendant.	)	

**DEFENDANT PHH MORTGAGE CORPORATION'S  
FIRST UNOPPOSED MOTION FOR EXTENSION OF TIME**

Defendant PHH Mortgage Corporation, successor by merger to Ocwen Loan Servicing, LLC ("PHH"), requests that this Court grant it an extension of time, through November 2, 2020, to file its response to the complaint for the reasons stated below.

Rule 6(b) of the Federal Rules of Civil Procedure allows for extensions of time for good cause when the extension is requested prior to the expiration of the original or extended deadline. This is PHH's first request for an extension of time. Plaintiff filed this lawsuit on or about May 13, 2020, but only served PHH on August 31, 2020. (Dkt. 1-1.) On September 30, 2020, PHH removed the matter to this Court, making its response due seven days later, on October 7, 2020.

PHH seeks an extension of time to respond to the complaint to allow it time to both research the allegations in the complaint and prepare a responsive pleading or motion. In addition, the parties recently began discussing settlement to see if an early resolution is possible. Thus, good cause exists to allow for the requested extensions.

On October 1, 2020, counsel for PHH discussed this requested extension with counsel for Plaintiff, and counsel for Plaintiff indicated that he does not oppose the requested extension.

For the foregoing reasons, PHH Mortgage Corporation respectfully requests an extension of time, through November 2, 2020, to file its response to the complaint, and for all other relief that is appropriate and just.

Dated: October 7, 2020

**PHH MORTGAGE CORPORATION, SUCCESSOR BY  
MERGER TO OCWEN LOAN SERVICING, LLC**

By: /s/ Ryan A. Sawyer  
*One of its Attorneys*

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 7, 2020, I caused the foregoing *First Unopposed Motion for Extension of Time* to be electronically filed using the CM/ECF system, which will serve all counsel of record, and further caused it to be served via email to the following individuals:

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/s/ Ryan A. Sawyer